

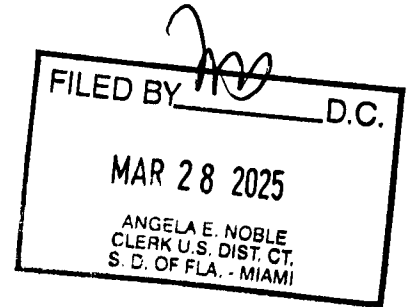
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Civil Case Number: _____

William Edward Madalinski
(Write the full name of the plaintiff)

vs.
The Key West Citizen

(Write the full name of the defendant/s in this case)



COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. Party Information

A. Plaintiff: William Edward Madalinski
Morrise County Detention Center
Address: 5501 College Rd, Key West, FL 33040
Inmate/Prison No.: 08015607
Year of Birth: 1973 (Do not include day or month, pursuant to Fed. R. Civ. P 5.2)
(Write your name, address and prison/inmate number, if applicable)

vs.

B. Defendant: Key West Citizen Newspaper Defendant: _____
Official Position: Newspaper Official Position: _____
Place of Employment: Key West Citizen Place of Employment: _____

(Write the full name of each defendant, official position and place of employment. Attach a separate page if you need additional space for additional defendants.)

II. Statement of Claim

Briefly describe the facts of your case. Describe how each defendant is involved, names of other persons involved, and dates and places. Each claim should be stated in a separately numbered paragraph. Please use short and plain statements, with separately numbered paragraphs indicating why the relief requested should be granted. Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

On February 3rd 2025, The Key West Citizen printed falsely, embellished, and unresearched or proven statements and accusations that I "distributed 20,000 or more lethal doses of fentanyl up and down the Keys".

This is an accusation not singularly true. They (the newspaper) has accused me of murder or/and a threat to the community. My legal charges don't reflect truth to this statement

III. Relief Requested

Briefly state what you are requesting from the Court (what do you want the Court to do). Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

I want a corrected printed statement, a published apology and \$120,000 dollars
Based on the defamation/slander act

IV. Jury Demand

Are you demanding a jury trial? Yes X No

Signed this 25th day of March, 2025
William Edward Madalena
Signature of Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 25th 2025
William E. Madalena
Signature of Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Civil Case Number: _____

William Edward Madulinski

(Write the full name of the plaintiff)

vs.

The Key West Citizer Newspaper

(Write the full name of the defendant/s in this case)

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. Party Information

A. Plaintiff: William Edward Madulinski

Address: 5501 College Rd - Key West, FL 33040

Inmate/Prison No.: 08015607

Year of Birth: 1973 (Do not include day or month, pursuant to Fed. R. Civ. P 5.2)

(Write your name, address and prison/inmate number, if applicable)

vs.

B. Defendant: Key West Citizer Newspaper Defendant: _____

Official Position: Newspaper Official Position: _____

Place of Employment: Key West Citizer Place of Employment: _____

(Write the full name of each defendant, official position and place of employment. Attach a separate page if you need additional space for additional defendants.)

II. Statement of Claim

Briefly describe the facts of your case. Describe how each defendant is involved, names of other persons involved, and dates and places. Each claim should be stated in a separately numbered paragraph. Please use short and plain statements, with separately numbered paragraphs indicating why the relief requested should be granted. Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

On February 3rd 2025, The Key West Citizen printed falsely, embellished, and unresearched or proven statements and accusations that I "distributed 20,000 or more lethal doses of festery/ up and down the Keys."

This is an accusation not even singularly true. They (the newspaper) has accused me of murder or/ and a threat to the community. My legal charges don't even reflect any possible truth to this statement.

III. Relief Requested

Briefly state what you are requesting from the Court (what do you want the Court to do). Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

I want a corrected printed statement, a publicized apology and \$/20,000 dollars.
Based on the defamation/ slander act.

IV. Jury Demand

Are you demanding a jury trial? ☐ Yes ☒ No

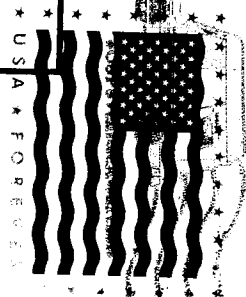
Signed this 25th day of March, 2025
William E. Madalinski
Signature of Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 25th 2025
William E. Madalinski
Signature of Plaintiff

am Edward Madalinski - 08015607
Roe County Detention Center
College Rd
West, FL 33040

MIAMI FL 330
25 MAR 2025 PM 5 L



REC'D BY _____ D.C.
MAR 28 2025
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

Clerks Office
United States District Court
Southern District of Florida
400 North Miami Avenue, 8N
Miami, FL 33128-7716

33128-771659

Mail

THIS LETTER IS FROM AN
INMATE/DETAINEE AT THE
MONROE COUNTY DETENTION CENTER
5501 COLLEGE ROAD, KEY WEST, FL 33040
ALL INCOMING MAIL MUST HAVE THE SENDERS
FULL NAME AND ADDRESS
INMATE/DETAINEE FULL NAME
PACKAGES, CASH, MONEY ORDERS OR PERSONEL
ITEMS. UNAUTHORIZED ITEMS WILL BE RETURNED
TO SENDER

